

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**1200 19<sup>th</sup> STREET, N.W.**

**SUITE 500**

**WASHINGTON, D.C. 20036**

\_\_\_\_\_  
(202) 955-9600

FACSIMILE

(202) 955-9792

www.kelleydrye.com

NEW YORK, NY  
TYSONS CORNER, VA  
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MUMBAI, INDIA  
TOKYO, JAPAN

DIRECT LINE (202) 887-1234

E-MAIL: jkashatus@kelleydrye.com

February 13, 2002

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Reply Comments of Cable & Wireless USA, Inc., Performance Measurements  
and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Mr. Caton:

Cable & Wireless USA, Inc. ("Cable & Wireless"), through its attorneys, submits the attached reply comments in the above-reference proceeding. Cable & Wireless attempted to file these comments with the Commission yesterday through the Electronic Comment Filing System ("ECFS"), but discovered that ECFS was undergoing "unscheduled maintenance." Pursuant to the Secretary's instructions from February 12, 2002, Cable & Wireless hereby files these comments electronically with the understanding that these comments will not be considered late filed.

Please contact me at (202) 887-1234 if you have any questions regarding this filing.

Sincerely,

Jennifer M. Kashatus

cc: Uzoma C. Onyeije, Common Carrier Bureau

Attachments